



Lalit K. Loomba, Esq.
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August 23, 2021

By ECF and First Class Mail

Hon. A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court
for the Eastern District of New York
Alfonse M. D'Amato Federal Building
100 Federal Plaza
Central Islip, NY 11722

Re: Joseph Jackson v. Nassau County et al., Docket No. 18-cv-3007 (JS) (AKT)
Our File No.: 12473.00014

Dear Judge Tomlinson:

Wilson Elser represents the County Defendants in the referenced action. As directed, we are enclosing herewith a revised privilege log showing the documents as to which the County Defendants are withdrawing privilege. The remaining documents for *in camera* review in connection with plaintiff's motion to compel. Documents containing express legal analysis are submitted as Exhibit A, while interview notes which reflect legal analysis are submitted as Exhibit B.

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

A handwritten signature in blue ink, appearing to read 'Lalit K. Loomba', written over a horizontal line.

Lalit K. Loomba

Enclosures (First Class Mail Only)

Cc (w/o encls.): Counsel of Record (via ECF)

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----	x	Docket No.: 18-CV-3007 (JS)
		(GRB)
JOSEPH JACKSON,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	COUNTY DEFENDANTS'
	:	REVISED PRIVILEGE LOG
NASSAU COUNTY; THE INCORPORATED VILLAGE	:	
OF FREEPORT; DETECTIVE ROBERT DEMPSEY;	:	
DETECTIVE GARY ABBONDANDELO; DETECTIVE	:	
JOHN M. HOLLAND; DETECTIVE MICHAEL HERTS;	:	
DETECTIVE MARTIN ALGER; DETECTIVE	:	
ANTHONY SORRENTINO; DETECTIVE DAVID L.	:	
ZIMMER; POLICE OFFICER MELENDEZ;	:	
LIEUTENANT BURDETTE; SERGEANT McHALE;	:	
SERGEANT NOLL; DETECTIVE SHARKEY; POLICE	:	
OFFICER DOWDELL; POLICE OFFICER BARRY	:	
McGOVERN; DETECTIVE TURNER; DETECTIVE	:	
EDWARD HAGGERTY; POLICE OFFICER HALL;	:	
DETECTIVE LAURETTE KEMP; DETECTIVE	:	
WILLIAM TWEEDY; DETECTIVE ANTHONY	:	
KOSIER; DETECTIVE SERGEANT DAN SEVERIN;	:	
DETECTIVE JERL MULLEN; THE ESTATE OF	:	
DETECTIVE JERL MULLEN; JOHN DOE, AS THE	:	
ADMINISTRATOR OF THE ESTATE OF JERL	:	
MULLEN; and JOHN and JANE DOE 1 through 20,	:	
	:	
Defendants.	:	
-----	x	

Bates	Author	Recipient	Document	Privilege
2843-2853	Sheryl Anania, Esq.	File	File Memo containing legal analysis of investigation of prosecution of Joseph Jackson	Attorney Work-Product
2899	Sheryl Anania, Esq.	File	Cover page from File Memo containing legal analysis of investigation of prosecution of Joseph Jackson	Attorney Work-Product
3043	Tammy J. Smiley, Esq.	Sheryl Anania	e-mail containing analysis re: Det. Robert Dempsey	Attorney Work-Product
3156	Sheryl Anania, Esq.	Mike Walsh	e-mail exchange December 4, 2017 re: Bob Dempsey and Gary Abbondandelo	Attorney Work Product
3157	Sheryl Anania, Esq.	File	Handwritten notes re: communication with Gary Abbondandelo	Attorney Work Product
3160-3162	Sheryl Anania, Esq.	File	File Memo and handwritten notes re call with Glen Montes on October 19, 2017	Attorney Work Product
3191-3192	Sheryl Anania, Esq.	File	Handwritten notes of investigation	Attorney Work Product
3195 – 3206	Caryn Stepner, Esq.	File	Handwritten notes of recap/review and recent interviews	Attorney Work Product
3207	Tammy Smiley, Esq.	Sheryl Anania, Esq.	Legal strategy	Attorney Work Product
3394	Sheryl Anania	File	Memo re call with Maurice Larrea on 10/2/17	Attorney Work Product
3395	Sheryl Anania Esq./Elizabeth Curcio	Sheryl Anania Esq./Elizabeth Curcio	Emails re factual investigation	Attorney Work Product
3396	Sheryl Anania, Esq.	Joshua Genn	Emails re factual investigation	Attorney Work Product
3436-3437	Dan Looney, Esq.	Mike Walsh, Esq.	Memo re sentencing and handwritten note	Attorney-Work Product
3438-3448	Sheryl Anania, Esq.	File	Memo re People v. Jackson	Attorney Work Product
3861-3864	Sheryl Anania, Esq.	File	Handwritten and typewritten notes and memo re Peddie Jackson	Attorney Work Product
4102-4107	NYS	n/a	Criminal History info re Roy Isaacs, Jr., printed November 14, 2017	
4108	Sheryl Anania, Esq.	File	Memo re meeting with Roy Isaacs, Jr.	Attorney Work Product

Bates	Author	Recipient	Document	Privilege
4111	Sheryl Anania, Esq.	File	Memo re phone interview with Skwanitra Witherspoon	Attorney Work Product
4112-4116, 4119	Sheryl Anania, Esq.; Joshua Glenn; Elizabeth Curcio	Sheryl Anania; Joshua Glenn; Elizabeth Curcio	Exchange of e-mails re: locating Skwanitra Witherspoon	Attorney Work Product
4120-4124	Sheryl Anania, Esq.	File	Memo and handwritten notes re phone interview with Skwanitra Witherspoon	Attorney Work Product
4141-4142	Paul Devore	Sheryl Anania, Esq.	Exchange of e-mails re: locating Roy Isaacs and Tyrone Isaacs	Attorney Work Product
4161-4172	NYS	n/a	Criminal History info re: Tyrone Jackson, printed November 14, 2017	

Dated: White Plains, New York
August 23, 2021

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/s/ Lalit K. Loomba

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